

Hearing Date: April 28, 2017
Hearing Time: 10:00 a.m.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

METRO NEWSPAPER ADVERTISING
SERVICES, INC.,

Chapter 11
Case No. 17-22445(RDD)

Debtor.

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**DECLARATION OF DIANA LAWRENCE OF HORIZON MEDIA, INC. IN SUPPORT
OF DEBTOR'S EMERGENCY MOTION FOR AN ORDER DETERMINING TRONC
INC. TO BE IN WILLFUL VIOLATION OF THE AUTOMATIC STAY, ETC.**

DIANA LAWRENCE, hereby declares and states, under penalties of perjury, as follows:

1. I am the Vice President of Digital Investment at Horizon Media, Inc. (“Horizon”), one of the customers of Metro Newspaper Advertising Services, Inc. (the “Debtor”), the debtor and debtor-in-possession in the above referenced Chapter 11 proceeding.
2. I hereby submit this Declaration in support of the motion (the “Motion”) being heard on April 28, 2016 seeking an Order directing Tronc and any of the Newspapers (as hereinafter defined) to cease and desist from any further attempts to collect monies owed to them by the Debtor from Horizon or from any of Horizon’s customers.

3. Horizon has utilized the services of the Debtor since December 2006.
4. Horizon contracted with the Debtor for services relating to the formulation, planning, pricing and placement of advertisements in newspapers that the Debtor conducts business with throughout the United States, including but not limited to Tronc (collectively,

the "Newspapers").

5. The nature of the customer relationship between Horizon and the Debtor has always been the same. First, Horizon places an order for various advertising placement services with the Debtor. The Debtor thereafter invoices Horizon for the ad and services it provides to Horizon and Horizon pays the Debtor for the placement of the ad and the services performed.

6. Throughout the entire course of the business relationship between Horizon and Debtor, Horizon always made payment exclusively to the Debtor and, more recently, to the Debtor's factor, Versant Funding LLC.

7. Since the Chapter 11 case, Horizon has been contacted by several of the Newspapers, including Tronc, demanding payment for monies owed to the Newspapers *by the Debtor*. Horizon would like direction from the Court to avoid the risk of alleged double liability.

I hereby declare under penalties of perjury that the foregoing is true and correct.

Executed on April 27, 2017.



DIANA LAWRENCE
Vice President, Digital Investment
Horizon Media, Inc.